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8 Attorney for DANIEL MARTIN BOYAR

9 **UNITED STATES DISTRICT COURT**

10 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 DANIEL MARTIN BOYAR,

15 Defendant.

16 Case No. 2:17-CR-021-JDM-WGF-1

17 **STIPULATION TO CONTINUE
18 SENTENCING HEARING
19 (FIRST REQUEST)**

20 IT IS HEREBY STIPULATED AND AGREED by and through RENE L.
21 VALLADARES, Federal Public Defender and CHRISTOPHER P. FREY, Assistant Federal
22 Public Defender, counsel for DANIEL MARTIN BOYAR and DAYLE ELIESON, United
23 States Attorney, and DANIEL COWHIG, Assistant United States Attorney, counsel for the
24 UNITED STATES OF AMERICA, that the Sentencing hearing set for May 22, 2018, at 10:00
25 AM, be vacated and continued to a date and time convenient to the Court but no earlier than
mid-September, 2018.

26 / / /

1 The continuance is necessary for the following reasons:

2 1. This is a joint request by counsel for the Government and counsel for the
3 Defendant, Mr. Boyar.

4 2. The additional time requested by this Stipulation is reasonable pursuant to
5 Federal Rule of Criminal Procedure 32(b)(2), which states that the “court may, for good cause,
6 change any time limits prescribed in this rule.”

7 3. Both counsel request this additional time in order to allow adequate time to
8 research sentencing issues and to prepare for the sentencing hearing.

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10 4. Mr. Boyar is currently detained and agrees with the continuance.

11
12 5. This is the first request for continuance of the sentencing hearing.

13 DATED this 20th day of April, 2018.

14 RENE L. VALLADARES
15 Federal Public Defender

DAYLE ELIESON
United States Attorney

16 By /s/ CHRISTOPHER P. FREY
17 CHRISTOPHER P. FREY
18 Assistant Federal Public Defender
Counsel for
DANIEL MARTIN BOYAR

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26 By /s/ DANIEL J. COWHIG
DANIEL J. COWHIG
Assistant United States Attorney
Counsel for the Government

ORDER

Based on the Stipulation of counsel, and good cause appearing,

IT IS THEREFORE ORDERED that the Sentencing Hearing currently set for May 22, 2018, at 10:00 AM, be vacated and continued to September 24, 2018 at 1030 a.m..

DATED this 23rd day of April, 2018.

James C. Mahan
JAMES C. MAHAN
UNITED STATES DISTRICT JUDGE
CASE NO.: 2:17-CR-00021-JCM-GWF